

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

FAIRFIELD PAGMA ASSOCIATES, LP, a New York
limited partnership, SEYMOUR KLEINMAN,
ESTATE OF MARJORIE KLEINMAN A/K/A
MARJORIE HELENE KLEINMAN, BONNIE
JOYCE KANSLER, as executor, FAIRFOX, LLC, a
New York limited liability company, and SEYFAIR,
LLC, a New York limited liability company,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-05169 (CGM)

STIPULATION AND ORDER MODIFYING BRIEFING SCHEDULE

Irving H. Picard, Esq., as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff, individually, and Fairfield Pagma Associates, LP, Seymour Kleinman, Estate Of Marjorie

Kleinman a/k/a Marjorie Helene Kleinman, Bonnie Joyce Kansler, as executor, Fairfax, LLC, and Seyfair, LLC, (the “Defendants,” and together with the Trustee, the “Parties”), by and through their undersigned counsel, state as follows:

WHEREAS, on November 17, 2021, the Trustee filed his motion for summary judgment in *Picard v. Fairfield Pagma Associates, LP*, Adv. Pro. No. 10-05169 (CGM) (Bankr. S.D.N.Y. Nov. 17, 2021, ECF No. 94) (the “Motion”);

WHEREAS, under Federal Rule of Bankruptcy Procedure 9006(d) and Local Bankruptcy Rule 9006-1, Defendants’ opposition to the Trustee’s Motion is due by December 1, 2021, the Trustee’s reply is due by December 8, 2021, and oral argument is scheduled for December 15, 2021; and

WHEREAS, the Parties have conferred and agree to modify the current briefing schedule as set forth below.

NOW, THEREFORE, the Parties agree and stipulate as follows:

1. Defendants shall file their opposition on or before December 22, 2021.
2. The Trustee shall file his reply on or before January 12, 2022.
3. The Parties shall appear for oral argument on the Trustee’s Motion on January 19, 2022.
4. The above deadlines granted by this Stipulation are without prejudice to either party seeking future extensions of time.
5. The Stipulation may be signed by respective counsel for the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: November 29, 2021
New York, New York

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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

SO ORDERED.

**Dated: December 1, 2021
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge**